UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION

Case No. 3:21-md-02981-JD

[PROPOSED] ORDER RE:

Judge James Donato

GOOGLE'S ADMINISTRATIVE

MOTION TO FILE UNDER SEAL

4

1

2

3

5 IN RE GOOGLE PALY STORE

6

THIS DOCUMENT RELATES TO:

ANTITRUST LITIGATION,

7

8

Epic Games, Inc. v. Google LLC et al., Case No. 3:20-cv-05671-JD

9

Match Group, LLC et al. v. Google LLC et al., Case No. 3:22-cv-02746-JD

1011

In re Google Play Consumer Antitrust Litigation, Case No. 3:20-cv-05761-JD

12

13

State of Utah et al. v. Google LLC et al., Case No. 3:21-cv-05227-JD

14

15

16

17

18

19

20

21

22

23

24

IT IS HEREBY ORDERED:

The following portions of Exhibit 4 and Exhibit 5 to the Kravis Declaration supporting Google's

Having considered Google's Administrative Motion to File Under Seal certain limited

portions of Google's March 14, 2023 submission (MDL Dkt. 463-2), ¶¶ 425-459 and ¶¶ 500-501

of the August 19, 2022 Declaration of Christian Cramer (MDL Dkt. 324-5), and any materials

submitted in support or in opposition thereto, pursuant to Local Rules 7-11 and 79-5;

March 14, 2023 submission (MDL Dkt. 463-2) may be filed under seal:

252627

28

Exhibit	Portion Containing Designated Information	Designating Party	Rulings
Exhibit 4 (Previously Exhibit A22 to the Cramer Decl.)	Exhibit 4, page -819 (entire boxes labeled "Impact" and "Ask").	Google (Cramer Declaration ¶ 425) Samsung (Exhibit B38, MDL Dkt	
,		324-4, Lee Declaration)	

1	Exhibit	Portion Containing Designated Information	Designating Party	Rulings
2	Exhibit 4	Exhibit 4, page -820 (entire	Google (Cramer Declaration ¶ 426)	
3 4 5	(Previously Exhibit A22 to the Cramer Decl.)	boxes labeled "Cross-Google Service Packs + Partner Pods," "Samsung + Google Gaming Collaboration," and "Accrue value back to Google").	Deciaration 420)	
	Exhibit 4	Exhibit 4, page -822 (between	Google (Cramer	
6 7	(Previously Exhibit A22 to the Cramer Decl.)	"HVUS:" and "of buyers"; between "spend" and "of app"; between "concentration of" and "reflect 2018"; entire top box).	Declaration ¶ 427)	
8	Exhibit 4	Exhibit 4, page -824 (icons in	Google (Cramer	
9 10	(Previously Exhibit A22 to the Cramer Decl.)	column 1 and figures in column 2 in rows 2-6; text in row 2 from the start of the sentence until	Declaration ¶ 428)	
11	,	"whether to launch"; text in footnote between "Projected" to "spend projection").		
12	Exhibit 4	Exhibit 4, page -825 (between	Google (Cramer	
13	(Previously Exhibit A22 to the	"margin loss (" and "revenue"; between "revenue /" and "margin	Declaration ¶ 429)	
14 15	Cramer Decl.)	at risk"; text in first row from "Play Revenue/Margin Risk" to the end of the sentence; the entire right hand box in row 1).	Samsung (Exhibit B38, MDL Dkt 324-4, Lee	
16	Exhibit 4	Exhibit 4, page -827 (entire box	Declaration) Google (Cramer	
17 18	(Previously Exhibit A22 to the Cramer Decl.)	under the slide title and icons).	Declaration ¶ 430)	
19	Exhibit 4	Exhibit 4, page -828 (entire box	Google (Cramer	
20	(Previously Exhibit A22 to the Cramer Decl.)	under "1) Prioritize Play"; entire box under the icons under "2) Boost x-PA Product Adoption").	Declaration ¶ 431)	
21	Exhibit 4	Exhibit 4, page -829 (entirety of	Google (Cramer	
22 23	(Previously Exhibit A22 to the Cramer Decl.)	the four rows in the chart).	Declaration ¶ 432)	
24	Exhibit 4	Exhibit 4, page -830 (the three	Google (Cramer	
25	(Previously Exhibit A22 to the Cramer Decl.)	boxes on the left side under "Target Developers").	Declaration ¶ 433)	
26	Exhibit 4	Exhibit 4, page -831 (the entire	Google (Cramer	
27 28		box under slide title and three headings; between "packs with" and ">").	Declaration ¶ 434)	

1	Exhibit	Portion Containing Designated Information	Designating Party	Rulings
3	(Previously Exhibit A22 to the Cramer Decl.)			
5	Exhibit 4 (Previously Exhibit A22 to the Cramer Decl.)	Exhibit 4, page -832 (entire box under slide title and three headings).	Google (Cramer Declaration ¶ 435)	
7 8	Exhibit 4 (Previously Exhibit A22 to the Cramer Decl.)	Exhibit 4, page -833 (entire box under slide title; between "2021 as" and "increases").	Google (Cramer Declaration ¶ 436)	
9 10 11	Exhibit 4 (Previously Exhibit A22 to the Cramer Decl.)	Exhibit 4, page -835 (box in the bottom right corner at the end of the arrow beneath "Niantic").	Google (Cramer Declaration ¶ 437)	
12 13 14 15	Exhibit 4 (Previously Exhibit A22 to the Cramer Decl.)	Exhibit 4, page -836 (entire first row until the slide title; text from "are win- win" through the end of that sentence; entire 3 bullet points under "Marketing opportunities"; entire 2 bullet points under "Playpoints").	Google (Cramer Declaration ¶ 438)	
16 17	Exhibit 4 (Previously Exhibit A22 to the Cramer Decl.)	Exhibit 4, page -838 (between "including" and "and 4 year"; entire chart under the slide title).	Google (Cramer Declaration ¶ 439)	
18 19 20	Exhibit 4 (Previously Exhibit A22 to the Cramer Decl.)	Exhibit 4, page -839 (entire right hand column under "Mitigation"; entire 3 bullet points beneath the chart).	Google (Cramer Declaration ¶ 440)	
21 22	Exhibit 4 (Previously Exhibit A22 to the Cramer Decl.)	Exhibit 4, page -842 (entirety of the box; between "includes" and "and also accounts").	Google (Cramer Declaration ¶ 441)	
232425	Exhibit 4 (Previously Exhibit A22 to the Cramer Decl.)	Exhibit 4, page -843 (entirety of the box under the slide title).	Google (Cramer Declaration ¶ 442)	
26 27 28	Exhibit 4 (Previously Exhibit A22 to the Cramer Decl.)	Exhibit 4, page -844 (entirety of the box under the slide title; between "of top developers" and "A couple of partial").	Google (Cramer Declaration ¶ 443)	

1	Exhibit	Portion Containing Designated Information	Designating Party	Rulings
2	Exhibit 4	Exhibit 4, page -845 (entirety of	Google (Cramer	
3 4	(Previously Exhibit A22 to the Cramer Decl.)	box under "Margin Impact (2019 - 2022)").	Declaration ¶ 444)	
5	Exhibit 4	Exhibit 4, page -846 (entirety of box under "Margin Impact (2019	Google (Cramer Declaration ¶ 445)	
$\begin{bmatrix} 6 \\ 7 \end{bmatrix}$	(Previously Exhibit A22 to the Cramer Decl.)	- 2022)").		
7	Exhibit 4	Exhibit 4, page -847 (entirety of	Google (Cramer	
$8 \parallel$	(Previously	box under "Margin Impact (2019 - 2022)").	Declaration ¶ 446)	
9	Exhibit A22 to the Cramer Decl.)	, ,		
0	Exhibit 4	Exhibit 4, page -848 (text in title between "against" and "of	Google (Cramer Declaration ¶ 447)	
1 2	(Previously Exhibit A22 to the Cramer Decl.)	margin"; entirety of box under slide title; text below box between "includes" and "and also").	Deciaration 447)	
	Exhibit 4	Exhibit 4, page -850 (entire box	Google (Cramer	
$\begin{bmatrix} 3 \\ 4 \end{bmatrix}$	(Previously Exhibit A22 to the	under slide title "Developer Value View").	Declaration ¶ 448)	
5 6	Cramer Decl.)		Nintendo (Exhibit B50, MDL Dkt 324-4, Singh Declaration)	
7	Exhibit 4	Exhibit 4, page -851 (entire box	Google (Cramer	
$8 \parallel$	(Previously Exhibit A22 to the	under slide title "Developer list").	Declaration ¶ 449)	
9	Cramer Decl.)	Exhibit 4, page -852 (entire box	Google (Cramer	
$\ 0$	Exhibit 4 (Previously	next to "Developer Eligibility";	Declaration ¶ 450)	
$1 \parallel$	Exhibit A22 to the Cramer Decl.)	entire box next to "Developer Obligations").		
$2 \ $	Exhibit 4	Exhibit 4, page -853 (title text	Google (Cramer	
3	(Previously Exhibit A22 to the	between "Hug Devs:" and "and"; between "and" and "FTE"; and entire box below the title).	Declaration ¶ 451)	
4	Cramer Decl.)	,		
5	Exhibit 4 (Previously	Exhibit 4, page -854 (title text from the beginning of the title	Google (Cramer Declaration ¶ 452)	
6 7	Exhibit A22 to the Cramer Decl.)	until "for Hug devs"; from "for Hug devs" until the end of the title; and entire box below the title).		

1

28

1	Exhibit	Portion Containing Designated Information	Designating Party	Rulings
2	Exhibit 4	Exhibit 4, page -857 (subtitle text from "Project Play Spend =" until	Google (Cramer Declaration ¶ 453)	
3 4	(Previously Exhibit A22 to the Cramer Decl.)	the end of that sentence; entirety of box under the subtitle).	Deciaration [455)	
5 6 7	Exhibit 4 (Previously Exhibit A22 to the Cramer Decl.)	Exhibit 4, page -859 (all rows and footnotes beneath the first row entitled "Payment & duration"; entire speaker notes at the bottom of the slide).	Google (Cramer Declaration ¶ 454)	
8 9	Exhibit 4 (Previously Exhibit A22 to the Cramer Decl.)	Exhibit 4, Pages -859 through - 860 (entire pages filed under seal).	Samsung (Exhibit B38, MDL Dkt 324-4, Lee Declaration)	
10 11 12 13	Exhibit 4 (Previously Exhibit A22 to the Cramer Decl.)	Exhibit 4, page -860 (entire first row under the slide title; first bullet point under "Must haves" in the second row; the very last bullet point under "Additional asks" in the second row).	Google (Cramer Declaration ¶ 455)	
14 15 16	Exhibit 4 (Previously Exhibit A22 to the Cramer Decl.)	Exhibit 4, page -861 (both bullet points in the first row to the right of the row title "Product"; both bullet points in the second row to the right of the row title "Financial").	Google (Cramer Declaration ¶ 456)	
17 18 19	Exhibit 4 (Previously Exhibit A22 to the Cramer Decl.)	Exhibit 4, page -862 (all 3 bullet points in the second row under "Mitigation"; the text under "Play band dilution" and to the right of "Mitigation"; and both bullet points under "Mitigation").	Google (Cramer Declaration ¶ 457)	
20	Exhibit 4	Exhibit 4, page -863 (under "Assumptions" the first bullet and	Google (Cramer Declaration ¶ 458)	
21 22	(Previously Exhibit A22 to the Cramer Decl.)	its header; the third bullet and its header; and the fourth bullet and its header).	Deciaration [456)	
23	Exhibit 4	Exhibit 4, page -864 (text in the subtitle between "Integrate"	Google (Cramer Declaration ¶ 459)	
24 25	(Previously Exhibit A22 to the Cramer Decl.)	Samsung with" and "to help drive"; the entire chart including footnotes under "Proposal / Details / Considerations").	Deciaration 439)	
26 27 28	Exhibit 5 (Previously Exhibit A30 to the Cramer Decl.)	Exhibit 5, page -690 ((three bullets under "GVP 1.0 Impact Assessment"); page -694 (images and logos on the left; between "GVP targeted" and "major	Google (Cramer Declaration ¶ 500) Aniplex (Exhibit B9,	

game ; between "(e.g., and 'or total Play"); page -695 (between "cg" and "xPA"); page -697 (text before "target devs signed"); all dollar and percentage figures; between "100% of titles" and "on Play" and titles)"; fourth bullet under "1) Prioritize Play" if if st bullet under "3) Improve Sentiment" between "to date (" and "devs asked pre"); page -698 (percentage figure in title; images of logos on the right; text before "is signing up"; graphic below title "2019 Play A&G Spend"); pages -699 and -700 (all percentage and dollar figures on slide and text; all text in bullets under "Cloud Deals."; all text before "new customer," "and new title," and "Expected to 40x spending"); page -701 (all images of logos); page -702 (between "Outside of" and "who is singularly"; all entries in first column on the left); page -703 (text after "Strategic partnership with"; all entries in first column on the left); page -705 (all dollar figure and percentage figures on slide; page - 706 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page -711 (all text underneath Google Gives" and "Google Gets	gs	Rulings	Designating Party	Portion Containing Designated Information	Exhibit	1
ictal Play"); page -695 (between "eg" and "xPA"); page -697 (text before "target devs signed"); all dollar and percentage figures; between "100% of titles" and "on Play"; between "on Play" and titles"); fourth bullet under "1) Prioritize Play" first bullet under "3) Improve Sentiment" between "to date (" and "devs asked pre"); page -698 (percentage figure in title; images of logos on the right; text before "target) devs" in title; images of logos on the right; text before "is signing up"; graphic below title "2019 Play A&G Spend"); pages -699 and -700 (all percentage and dollar figures on slide and text; all text in bullets under "Cloud Deals:"; all text before "new customer," and new title," and "Expected to 40x spending"); page -701 (between "Outside of" and "who is singularly"; all entries in first column on the left); page -703 (text after "Strategic partnership with"; all entries in first column on the left); page -705 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page -711 (all text underneath column titled "Comments"); page -712 (bullet points underneath "Google Gives" and "Google Gets"			MDL Dkt 324-4,	game": between "(e.g.," and "of		2
before "target devs signed"); all dollar and percentage figures; between "100% of itiles" and "on Play" between "on Play" and titles)"; fourth bullet under "1) Prioritize Play" first bullet under "3) Improve Sentiment" between "to date (" and "devs asked pre"); page -698 (percentage figure in title; text before "target) devs" in title; images of logos on the right; text before "is signing up"; graphic below title "2019 Play A&G Spend"); pages -699 and -700 (all percentage and dollar figures on slide and text; all text in bullets under "Cloud Deals:"; all text before "new customer," "and new title," and "Expected to 40x spending"); page -701 (all dollar in mages of logos); page -702 (between "Outside of" and "who is singularly"; all entries in first column on the left); page -703 (text after "Strategic partnership with"; all entries in first column on the left); page -705 (all dollar figure and percentage figures on slide); page -707 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page -711 (all text underneath column titled "Comments"); page -712 (bullet points underneath "Google Gives" and "Google Gets" and "G			Toyoma	total Play"); page -695 (between		3
dollar and percentage figures; between "100% of titles" and "on Play" and titles)"; between "on Play" and titles)"; fourth bullet under "1) Prioritize Play" first bullet under "3) Improve Sentiment" between "to date (" and "devs asked pre"); page -698 (percentage figure in title; itext before "target) devs" in title; images of logos on the right; text before "is signing up"; graphic below title "2019 Play A&G Spend"); pages -699 and -700 (all percentage and dollar figures on slide and text; all text in bullets under "Cloud Deals:"; all text before "new customer," and new title," and "Expected to 40x spending"); page -701 (all images of logos); page -702 (between "Outside of" and "who is singularly"; all entries in first column on the left); page -703 (text after "Strategic partnership with"; all entries in first column on the left); page -705 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" 21						
between "100% of titles" and "on Play"; between "on Play" and titles)"; fourth bullet under "1) Prioritize Play" first bullet under "3) Improve Sentiment" between "to date ("and "devs asked pre"); page -698 (percentage figure in title; text before "target) devs" in title; images of logos on the right; text before "fis signing up"; graphic below title "2019 Play A&G Spend"); pages -699 and -700 (all percentage and dollar figures on slide and text; all text in bullets under "Cloud Deals:"; all text before "new customer," and new title," and "Expected to 40x spending"); page -701 (all images of logos); page -702 (between "Outside of" and "who is singularly"; all entries in first column on the left); page -703 (text after "Strategic partnership with"; all entries in first column on the left); page -705 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page -711 (all text underneath column titled "Comments"); page -712 (bullet points underneath "Google Gives" and "Google Gets"						4
Play'; between "on Play' and titles)"; fourth bullet under "1) Prioritize Play" first bullet under "3) Improve Sentiment" between "to date (" and "devs asked pre"); page -698 (percentage figure in title; text before "target) devs" in title; images of logos on the right; text before "is signing up"; graphic below title "2019 Play A&G Spend"); pages -699 and -700 (all percentage and dollar figures on slide and text; all text in bullets under "Cloud Deals:"; all text before "new customer," "and new title," and "Expected to 40x spending"); page -701 (all images of logos); page -702 (between "Outside of" and "who is singularly"; all entries in first column on the left); page -703 (text after "Strategic partnership with"; all entries in first column on the left); page -7073 (text after "Strategic partnership with"; all entries in first column on the left); page -7073 (ittle between "An" and "figure and percentage figures on slide; page -706 (entire bar graph); page -707 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page -712 (bullet points underneath "Google Gives" and "Google			-			ا 5
Prioritize Play" first bullet under "3) Improve Sentiment" between "to date (" and "devs asked pre"); page -698 (percentage figure in title; text before "target) devs" in title; mages of logos on the right; text before "is signing up"; graphic below title "2019 Play A&G Spend"); pages -699 and -700 (all percentage and dollar figures on slide and text; all text in bullets under "Cloud Deals:"; all text before "new customer," and new title," and "Expected to 40x spending"); page -701 (all images of logos); page -702 (between "Outside of" and "who is singularly"; all entries in first column on the left); page -703 (text after "Strategic partnership with"; all entries in first column on the left); page -7073 (ittle between "An" and "fior game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page -711 (all text underneath slide except "Both" and "meet the criteria"); page -712 (bullet points underneath "Google Gives" and "Google Gives" and "Google Gets")			Non-Party*	Play"; between "on Play" and		3
"3) Improve Sentiment" between "to date (" and "devs asked pre"); page -698 (percentage figure in title; text before "target) devs" in title; images of logos on the right; text before "is signing up"; graphic below title "2019 Play A&G Spend"); pages -699 and - 700 (all percentage and dollar figures on slide and text; all text in bullets under "Cloud Deals:"; all text before "new customer," "and new title," and "Expected to 40x spending"); page - 701 (all images of logos); page -702 (between "Outside of" and "who is singularly"; all entries in first column on the left); page -703 (text after "Strategic partnership with"; all entries in first column on the left); page -705 (all dollar figure and percentage figures on slide); page - 706 (entire bar graph); page -707 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page - 712 (bullet points underneath Google Gives" and "Google Gets						6
"to date (" and "devs asked pre"); page -698 (percentage figure in title; text before "target) devs" in title; images of logos on the right; text before "is signing up"; graphic below title "2019 Play A&G Spend"); pages -699 and - 700 (all percentage and dollar figures on slide and text; all text in bullets under "Cloud Deals:"; all text before "new customer," and new title," and "Expected to 40x spending"); page - 701 (all images of logos); page -702 (between "Outside of" and "who is singularly"; all entries in first column on the left); page -703 (text after "Strategic partnership with"; all entries in first column on the left); page -705 (all dollar figure and percentage figures on slide); page -706 (entire bar graph); page -707 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page - 712 (bullet points underneath Google Gives" and "Google Gets						_
page -698 (percentage figure in title; text before "target) devs" in title; images of logos on the right; text before "is signing up"; graphic below title "2019 Play A&G Spend"); pages -699 and -700 (all percentage and dollar figures on slide and text; all text in bullets under "Cloud Deals:"; all text before "new customer," and new title," and "Expected to 40x spending"); page -701 (all text after "Strategic partnership with"; all entries in first column on the left); page -703 (text after "Strategic partnership with"; all entries in first column on the left); page -705 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page - 712 (bullet points underneath "Google Gives" and "Google G						7
title; text before "target) dews" in title; images of logos on the right; text before "is signing up"; graphic below title "2019 Play A&G Spend"); pages -699 and -700 (all percentage and dollar figures on slide and text; all text in bullets under "Cloud Deals:"; all text before "new customer," and new title," and "Expected to 40x spending"); page -701 (all images of logos); page -702 (between "Outside of" and "who is singularly"; all entries in first column on the left); page -703 (text after "Strategic partnership with"; all entries in first column on the left); page -705 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page - 711 (all text underneath column titled "Comments"); page - 712 (bullet points underneath "Google Gives" and "Google Gets")				page -698 (percentage figure in		8
text before "is signing up"; graphic below title "2019 Play A&G Spend"); pages -699 and -700 (all percentage and dollar figures on slide and text; all text in bullets under "Cloud Deals."; all text before "new customer," and new title," and "Expected to 40x spending"); page - 701 (all images of logos); page -702 (between "Outside of" and "who is singularly"; all entries in first column on the left); page -703 (text after "Strategic partnership with"; all entries in first column on the left); page -705 (all dollar figure and percentage figures on slide); page -707 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page - 711 (all text underneath column titled "Comments"); page - 712 (bullet points underneath "Google Gives" and "Google Gets						
graphic below title "2019 Play A&G Spend"); pages -699 and - 700 (all percentage and dollar figures on slide and text; all text in bullets under "Cloud Deals:"; all text before "new customer," "and new title, "and "Expected to 40x spending"); page - 701 (all images of logos); page -702 (between "Outside of" and "who is singularly"; all entries in first column on the left); page -703 (text after "Strategic partnership with"; all entries in first column on the left); page -705 (all dollar figure and percentage figures on slide); page -706 (entire bar graph); page -707 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page - 711 (all text underneath column titled "Comments"); page - 712 (bullet points underneath "Google Gives" and "Google Gets						9
A&G Spend"); pages -699 and - 700 (all percentage and dollar figures on slide and text; all text in bullets under "Cloud Deals:"; all text before "new customer," "and new title," and "Expected to 40x spending"); page - 701 (all images of logos); page -702 (between "Outside of" and "who is singularly"; all entries in first column on the left); page -703 (text after "Strategic partnership with"; all entries in first column on the left); page -705 (all dollar figure and percentage figures on slide); page - 706 (entire bar graph); page -707 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page - 712 (bullet points underneath column titled "Comments"); page - 712 (bullet points underneath "Google Gives" and "Google Gets			The state of the s			10
figures on slide and text; all text in bullets under "Cloud Deals:"; all text before "new customer," "and new title," and "Expected to 40x spending"); page - 701 (all images of logos); page -702 (between "Outside of" and "who is singularly"; all entries in first column on the left); page -703 (text after "Strategic partnership with"; all entries in first column on the left); page -705 (all dollar figure and percentage figures on slide); page -706 (entire bar graph); page -707 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page -711 (all text underneath column titled "Comments"); page -712 (bullet points underneath "Google Gives" and "Google Gets")			MLB* Niantic	A&G Spend"); pages -699 and -		10
in bullets under "Cloud Deals:"; all text before "new customer," "and new title," and "Expected to 40x spending"); page - 701 (all images of logos); page - 702 (between "Outside of" and "who is singularly"; all entries in first column on the left); page -703 (text after "Strategic partnership with"; all entries in first column on the left); page -705 (all dollar figure and percentage figures on slide); page - 706 (entire bar graph); page -707 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page -711 (all text underneath column titled "Comments"); page -712 (bullet points underneath "Google Gives" and "Google Gets"						11
all text before "new customer," "and new title," and "Expected to 40x spending"); page - 701 (all images of logos); page -702 (between "Outside of" and "who is singularly"; all entries in first column on the left); page -703 (text after "Strategic partnership with"; all entries in first column on the left); page -705 (all dollar figure and percentage figures on slide); page - 706 (entire bar graph); page - 707 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page - 711 (all text underneath column titled "Comments"); page - 712 (bullet points underneath "Google Gives" and "Google Gets						.
"and new title," and "Expected to 40x spending"); page - 701 (all images of logos); page - 702 (between "Outside of" and "who is singularly"; all entries in first column on the left); page - 703 (text after "Strategic partnership with"; all entries in first column on the left); page - 705 (all dollar figure and percentage figures on slide); page - 706 (entire bar graph); page - 707 (all dollar figure and percentage figures on slide; entire chart); page - 710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page - 711 (all text underneath column titled "Comments"); page - 712 (bullet points underneath "Google Gives" and "Google Gets						12
14 (between "Outside of" and "who is singularly"; all entries in first column on the left); page -703 (text after "Strategic partnership with"; all entries in first column on the left); page -705 (all dollar figure and percentage figures on slide); page -706 (entire bar graph); page -707 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page -712 (bullet points underneath "Google Gives" and "Google Gets")						13
(between "Outside of" and "who is singularly"; all entries in first column on the left); page -703 (text after "Strategic partnership with"; all entries in first column on the left); page -705 (all dollar figure and percentage figures on slide); page -706 (entire bar graph); page -707 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page -711 (all text underneath column titled "Comments"); page -712 (bullet points underneath "Google Gives" and "Google Gets						
is singularly"; all entries in first column on the left); page -703 (text after "Strategic partnership with"; all entries in first column on the left); page -705 (all dollar figure and percentage figures on slide); page - 706 (entire bar graph); page -707 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page -711 (all text underneath column titled "Comments"); page -712 (bullet points underneath "Google Gives" and "Google Gets						14
(text after "Strategic partnership with"; all entries in first column on the left); page -705 (all dollar figure and percentage figures on slide); page -706 (entire bar graph); page -707 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page -711 (all text underneath column titled "Comments"); page -712 (bullet points underneath "Google Gives" and "Google Gets			\mathbf{c}			15
with"; all entries in first column on the left); page -705 (all dollar figure and percentage figures on slide); page - 706 (entire bar graph); page -707 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page - 711 (all text underneath column titled "Comments"); page - 712 (bullet points underneath "Google Gives" and "Google Gets						
on the left); page -705 (all dollar figure and percentage figures on slide); page - 706 (entire bar graph); page -707 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page -711 (all text underneath column titled "Comments"); page -712 (bullet points underneath "Google Gives" and "Google Gets						16
figure and percentage figures on slide); page - 706 (entire bar graph); page -707 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page -711 (all text underneath column titled "Comments"); page -712 (bullet points underneath "Google Gives" and "Google Gets						17
graph); page -707 (all dollar figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page -711 (all text underneath column titled "Comments"); page -712 (bullet points underneath "Google Gives" and "Google Gets				figure and percentage figures on		1 /
figure and percentage figures on slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page -711 (all text underneath column titled "Comments"); page -712 (bullet points underneath "Google Gives" and "Google Gets						18
slide; entire chart); page -710 (title between "An" and "for game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page - 711 (all text underneath column titled "Comments"); page - 712 (bullet points underneath "Google Gives" and "Google Gets						.
game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page - 711 (all text underneath column titled "Comments"); page - 712 (bullet points underneath "Google Gives" and "Google Gets						19
game developers"; entire graphic beneath "New to Play PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page - 711 (all text underneath column titled "Comments"); page - 712 (bullet points underneath "Google Gives" and "Google Gets						20
PC/Console Devs" and "On Play "enterprise" Developers"; all text underneath slide except "Both" and "meet the criteria"); page - 711 (all text underneath column titled "Comments"); page - 712 (bullet points underneath "Google Gives" and "Google Gets						
22 "enterprise" Developers"; all text underneath slide except "Both" 23 and "meet the criteria"); page - 711 (all text underneath column titled "Comments"); page - 712 (bullet points underneath "Google Gives" and "Google Gets						21
23 and "meet the criteria"); page - 711 (all text underneath column titled "Comments"); page - 712 (bullet points underneath "Google Gives" and "Google Gets				"enterprise" Developers"; all text		$22 \parallel$
711 (all text underneath column titled "Comments"); page - 712 (bullet points underneath "Google Gives" and "Google Gets						
titled "Comments"); page - 712 (bullet points underneath "Google Gives" and "Google Gets						23
(bullet points underneath "Google Gives" and "Google Gets						24
				(bullet points underneath "Google		2 4
[[] [(oontrootyol))]), maga 712 (oll						25
(contractual)"); page -713 (all dollar figure and percentage						26
26						20
before "GVP 2.0 developers						$27 \ $
offer' in fourth bullet point;						
28 Footnote 1; between "already						28

1	Exhibit	Portion Containing Designated Information	Designating Party	Rulings
2		getting" and "of Play" in	<u> </u>	
3		Footnote 2); page - 715 (two		
		graphics on the right and left in		
4		the center of the slide; figure between "offered at" and "& met		
ا ہ		the following"; figure between		
5		"Google footprint;" and		
6		"incremental Google"; figure		
		after "against investment of");		
7		page -717 (text beneath "Google Gives" and "Google Gets"); page		
		-718 (text in boxes below		
8		"Runway", "GVP", and "GVP (in		
9		conjunction w/ Runway"); page -		
		719 (all text in boxes under		
10		"Option 1", "Option 2", and "Option 3 (R)"); page -722 (all		
11		dollar figure and percentage		
11		figures on slide; figures in the		
12		row titled "# of developers") text		
		in "Google Gets" row; text in "Term" row;); page -725 (all		
13		dollar figure and percentage		
14		figures on slide); page -726 (first		
17		three values in the boxes on the		
15		right); page -728 (title between		
1.		"with" and "offers"; all dollar figures; logos and images under		
16		"Top Games Bundle Offer");		
17		page -728 (images and logos; text		
		under slide between "world of" and "interact with"); page -730		
18		(all dollar figures, percentages,		
19		and numerical values in graphic		
1		on slide; all text underneath		
20		slide); page -731 (all text		
_		underneath title); page -732 (all dollar figure and percentage		
21		figures on slide; entire chart; first		
22		bullet point: text before		
		"developers expected" and		
23		between "sign a deal with" and "developers"); page -733 (all		
24		dollar figure and percentage		
24		figures under "Actual"); page -		
25		734 (all dollar figure and		
		percentage figures on slide; first bullet point underneath Key		
26		Highlights, text before "receviing		
27		UAC credits" and between "part		
- '		of Hug with" and "in credits		
28		received"); page -735 (all dollar		
	L	figure and percentage figures on		ı

1	Exhibit	Portion Containing Designated Information	Designating Party	Rulings
2		slide; entire chart; non-party		
3		identities underneath slide); page -736 (all dollar figure and		
4		percentage figures on slide; entire chart); page - 737 (all dollar		
5		figure and percentage figures on slide; entire chart; non- party		
6		identities underneath slide); page -738 (entire chart); page -739 (all		
7		images of logos); page -740 and -741 (all non-party names and		
8		identities); page -741 (all text in the four boxes); page -743 (all		
9		text in the "Google Gets" and "Google Gives" rows); page -744		
10		(text underneath "DevRel Consultations," "YT Influencers,"		
11		"UAC credits," "YT channel growth"); page -745 (text in rows		
12		for "eligibility criteria" and "Play % reinvested"; all text in the		
13		"Google Gives" and "Google Gets" rows); page -746 (all dollar		
14		figure and percentage figures on slide; entire chart; non-party		
15		identities); page -749 (between "we have signed up" and "target		
16		devs;"); page -753 (text below "Deal structure option 1", "Deal		
17		structure option 2", "Deal structure option 3 (R)"); page -		
18		754 (text below "Deal structure option 1", "Deal structure option		
19		2", "Deal structure option 3 (R)"); page -757 (all dollar figure and		
20		percentage figures on slide)).		
21	Exhibit 5	Exhibit 5, pages -757.R (email username in the fourth row of the	Google (Cramer Declaration ¶ 501)	
22	(Previously Exhibit A30 to the Cramer Decl.)	table, between "@" and "@google.com").		
23				
24	Datad	2022		
	Dated:	, 2023		

21	Exhibit 5	Exhibit 5, pages -757.R (email	Google (Cramer	
22	(Previously Exhibit A30 to the Cramer Decl.)	username in the fourth ro table, between "@" and "@google.com").	w of the	Declaration ¶ 501)
23	Cramer Been)				
24					
25	Dated:	, 2023	Honorabl	le James Donato	
26				tates District Judge District of Califor	
27			1,0101111		
28					
			-8-		Case No. 3:20-cv-05761-JD
	[PROPOSED] ORDER RE: GOOGLE'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL				